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**IN THE UNITED STATES DISTRICT COURT**  
**FOR THE DISTRICT OF OREGON**

**UNITED STATES OF AMERICA,**

**No. 3:20-cr-00463-HZ**

**Plaintiff,**

**UNOPPOSED MOTION TO  
MODIFY THE CONDITIONS  
OF PRETRIAL RELEASE**

**v.**

**PEDRO ALDO RAMOS, JR.,**

**Defendant.**

The defendant, Pedro Aldo Ramos, Jr., through his attorney, Ryan Costello, respectfully moves this Court for an order modifying the conditions of his pretrial release by amending his curfew condition to allow him to leave his home after curfew for work related reasons. Mr. Ramos's condition currently reads, "Comply with the following curfew: 12:00am to 5:30am." Mr. Ramos requests the Court amend the condition to read, "Comply with the following curfew: 12:00am to 5:30am, *except for any work-related duties and travel.*"

Fortunately, Mr. Ramos's company hired him as a permanent employee rather than a temporary employee. As a new permanent employee, Mr. Ramos is expected to be on-call for

emergency calls from customers requesting service after hours or when other employees call-in sick. Mr. Ramos's company installs and fixes cables for contracting companies at various work sites in the Portland area. Although Mr. Ramos will be scheduled to be on-call some days, he could easily be called in on days he is not scheduled to be on-call. Mr. Ramos expects he will be called into a worksite after his curfew, and needs the Court's permission to be outside his home after curfew for work-related duties and travel.

Mr. Ramos began pretrial release on September 8, 2020. He has no reported violations on his pretrial release.

The government, through Assistant United States Attorney Thomas Ratcliffe, has no objection to this motion. United States Pretrial Services takes no position about the motion because U.S. Pretrial Services does not actively supervise Mr. Ramos.

Respectfully submitted this 19th day of August 2021

/s/ Ryan Costello

Ryan Costello

Assistant Federal Public Defender